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*Attorney for Plaintiff*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SYDNEY SHACKERFORD,

Plaintiff,

vs.

NEVADA DEPARTMENT OF  
CORRECTIONS; STATE OF NEVADA;  
JAMES DZURENDA, in his official capacity  
as Director for the Nevada Department of  
Corrections; JEREMY BEAN, in his  
individual and official capacity as Warden of  
High Desert State Prison; CORRECTIONS  
OFFICER MACEDO, in his individual and  
official capacity; DOES 1 through 15; and  
ROE ENTITIES 1 through 5, inclusive,

Defendants.

Case No. 2:23-CV-02069-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY (First  
Request)**

Plaintiff, SYDNEY SHACKERFORD, by and through his counsel of record, PETER M. ANGULO, ESQ., of the ANGULO LAW GROUP and Defendants, JEREMY BEAN, JAMES DZURENDA, ARTURA MACEDO, the STATE OF NEVADA and the NEVADA DEPARTMENT OF CORRECTIONS by and through their counsel AARON D. FORD, Attorney General and RUDOLF M. D'SILVA, Deputy Attorney General, (collectively, "the Parties") submit the following Stipulation and proposed Order pursuant to LR 26-3 hereby agreeing to a 120-day continuance of the current discovery deadline to give the parties additional time to conduct discovery.

**I. STATEMENT OF DISCOVERY COMPLETED TO DATE**

On September 9, 2024 Defendants submitted their Initial Production of Documents and Witnesses.

1 On September 23, 2024 Plaintiff submitted his Initial Production of Documents and Witnesses.

2 On November 25, 2024 Plaintiff submitted Interrogatories to the Nevada Department of  
3 Corrections.

4 On November 25, 2024 Plaintiff submitted Request for Admissions to the Nevada Department of  
5 Corrections.

6 On November 25, 2024 Plaintiff submitted Requests for Production to the Nevada Department of  
7 Corrections.

8 On January 22, 2025 Defendants submitted their First Supplement to Initial Production of  
9 Documents and Witnesses.

10 On January 22, 2025 Defendant the Nevada Department of Corrections submitted its Responses to  
11 Plaintiff's Request for Admissions.

12 On January 22, 2025 Defendant the Nevada Department of Corrections submitted its Responses to  
13 Plaintiff's Request for Production.

14 On January 30, 2025 Defendant the Nevada Department of Corrections submitted its Answers to  
15 Plaintiff's Interrogatories.

16 **II. STATEMENT OF DISCOVERY THAT NEEDS TO BE COMPLETED**

17 Deposition of Jeremy Bean

18 Deposition of James Dzurenda

19 Deposition of Arturo Macedo

20 Deposition of PMK of Nevada Department of Corrections

21 Deposition of Sydney Shackerford

22 Depositions of Plaintiff's treating physicians

23 **III. REASONS WHY DISCOVERY SHOULD BE EXTENDED**

The parties are diligently engaged in discovery. Plaintiff is currently housed at the Southern New Mexico Correctional Facility. An executed HIPAA authorization was only received on February 5, 2025 so that the parties can obtain medical records and bills from the Memorial Bone and Joint Center in Las Cruces, New Mexico.

Counsel for Plaintiff has further been out of the country since January 23, 2025 and is not due to return until February 12, 2025. Counsel for Plaintiff further has a trial scheduled on March 3, 2025 for which he is first on the stack in the matter of *Watkins v. Kanapathy*, Case No. A-20-820714-C. This trial is scheduled to last 7-10 days.

Defendants are currently awaiting Plaintiff's counsel to return back to the country so that they may discuss and potentially stipulate to a protective order prior to defense counsel disclosing certain documents to Plaintiff.

The parties are seeking a 120-day continuance of the current discovery deadlines to give the parties sufficient time to conduct depositions as outlined above.

#### IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

It is hereby stipulated that the discovery cutoff deadline be extended for a period of 120 days. If approved, the new discovery deadlines would be modified as follows:

<u>Task</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Last day to amend pleadings and add parties	November 28, 2024	CLOSED
Last day to disclose initial experts and reports	December 30, 2024	CLOSED
Last day to disclose rebuttal experts and reports	January 29, 2025	CLOSED
Discovery cutoff	February 26, 2025	June 26, 2025
Last day to file dispositive motions	March 28, 2025	July 28, 2025 <sup>1</sup>

<sup>1</sup>As 60 days prior to the last day to file dispositive motions falls on Saturday, July 26, 2025, the date has been adjusted accordingly.

1 Pre-Trial Order	2 April 27, 2025	3 August 25, 2025
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4 DATED this 5<sup>th</sup> day of February, 2025.

5 DATED this 5<sup>th</sup> day of February, 2025.

6 ANGULO LAW GROUP

7 AARON D. FORD, Attorney General

8 By /s/ Peter M. Angulo

9 By /s/ Rudolf M. D'Silva

10 PETER M. ANGULO, ESQ.

11 RUDOLF M. D'SILVA, ESQ.

12 Nevada Bar No. 003672

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14 5545 S. Mountain Vista Street, Suite F

15 1 State of Nevada Way, Suite 100

16 Las Vegas, Nevada 89120

17 Las Vegas, Nevada 89119

18 Attorneys for Plaintiff

19 Attorneys for Defendants

20 **ORDER**

21 IT IS SO ORDERED:

22 

23 DANIEL J. ALBREGTS

24 UNITED STATES MAGISTRATE JUDGE

25 DATED: 2/6/2025

## Margaret Anthis

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**From:** Rudolf M. D'Silva <rdsilva@ag.nv.gov>  
**Sent:** Wednesday, February 5, 2025 11:13 AM  
**To:** Margaret Anthis  
**Subject:** RE: Shackerford v. Macedo  
**Attachments:** SO Extend Discovery (1st Request) - rmd.docx

**CAUTION:** This email originated from outside of the organization. Be cautious when opening attachments or clicking links.

Hi Margaret,

Attached are my changes. If you're ok with these changes I'm fine with you affixing my signature.

Best,

**Rudolf M. D'Silva**  
Deputy Attorney General  
Office of the Nevada Attorney General  
Public Safety Division  
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Las Vegas, NV 89119  
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**From:** Margaret Anthis <manthis@angulolawgroup.com>  
**Sent:** Wednesday, February 5, 2025 11:00 AM  
**To:** Rudolf M. D'Silva <rdsilva@ag.nv.gov>  
**Subject:** Shackerford v. Macedo

**WARNING:** This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Mr. D'Silva, please review the attached Stip and Order to Extend Discovery. I left you a voicemail as Peter did not leave me any instructions other than to prepare this document. I asked for 120 days. Please let me know what your reasons are for discovery not being completed. I have put all of Peters in. Thanks.